## **EXHIBIT A**

## Appendix A

Defs' RFPs	Defs' 30(b)(6) Topics	July 19 Transcript (Dkt. 180-1)	July 22 Order (Dkt. 162)
Defs' RFPs  15. Documents sufficient to show any rating, performance evaluation, or review of either Individual Defendant at Jane Street, including documents sufficient to show their rating relative to each other and/or to any other Jane Street trader(s).  16. Documents sufficient to show total compensation of each person within Jane Street who either trades securities or derivatives or oversees trading of	Defs' 30(b)(6) Topics  17. Jane Street's discussions and decisions concerning compensation and retention policies, including performance incentives and non-compete agreements, for year-end 2023 and year-end 2024.  18. Jane Street's rating, performance evaluation, review, and compensation decisions for year-end 2023 of Jane Street personnel involved in trading, research, development, or oversight of India Options Trading or personnel involved in the Alleged Trade Secrets.	July 19 Transcript (Dkt. 180-1)	July 22 Order (Dkt. 162)  Jane Street refused to produce documents reflecting ratings, performance review, or compensation information for employees other than the Individual Defendants.  Defendants did not move to compel RFPs 15 or 16.
securities or derivatives for 2020, 2021, 2022 and 2023.	25. The amount of income, profits, or compensation received by the following individuals for 2022, 2023, and to-date 2024 relating to Jane Street activities, including the amount which is attributable to Indian Options Trading:	"[A]s formulated, that's an	"The Court orders Jane Street to
communications between	departures by traders or	outrageous request. There are plenty	respond to RFP 21, with the

December 1, 2023 and April 12, 2024 concerning the actual or potential departure of any Jane Street personnel from Jane Street, including any actions or measures discussed, considered, or taken by Jane Street in respect of any such actual or potential departures. personnel with supervisory responsibility for traders since November 1, 2023, and any action considered or taken by Jane Street in response.

24. Adverse actions taken or considered by Jane Street with respect to any former employee, including letters, correspondence, or legal action.

of people who leave Jane Street under a host of other situations. There is nothing about that request that has anything that looks like comparator status or anything like it built in .... I am just trying to understand what is the scenario here in which a responsive document is germane .... The request, though, is extremely broad. It feels to me like the nub of a valid request here gets to the internal discussions that, explicitly or implicitly, relate to the departure of these two people .... But right now it's quite overbroad." Tr. 49:9-52:7.

significant limitation that Jane Street need only produce documents and communications that relate or refer to, or reflect upon, the departures of the individual defendants. Defendants' initial proposal—to require production of documents and communications related to any employees' actual or prospective departure—was overbroad. Only documents and communications that bear on the individual defendants are properly produced pursuant to this request." Dkt. 162, at 4.